

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS & PRIORITY MAIL CONTRACT  
11 (MC2013-1)  
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2013-1

**MOTION OF THE UNITED STATES POSTAL SERVICE  
FOR TEMPORARY RELIEF**  
(December 11, 2015)

The United States Postal Service hereby moves for temporary relief, to allow the existing contract in this docket to remain in effect for thirty (30) additional days. The existing contract is set to expire on December 18, 2015, pursuant to PRC Order No. 2768. As noted in the Postal Service's previous motion for relief, dated October 15, 2015, the customer had been experiencing significant technical difficulties with pulling data needed for the Postal Service to formulate its pricing proposal. The Postal Service can now report that those technical issues were resolved, and the necessary data were transmitted to the Postal Service on November 25, 2015. This process took longer than the Postal Service expected, which did not allow the parties to sign a new contract more than fifteen days prior to the December 18 expiration date.

Nevertheless, the Postal Service has submitted a final contract to the customer for signature, and expects to receive the signed contract back from the customer within the next week. Therefore, the Postal Service respectfully requests that the Commission grant an additional thirty (30) day extension to allow the existing contract to remain in effect, until such time as the Commission has an opportunity to complete its review of the successor contract. Thus, the proposed extension would only last for a finite and

short period of time. In conclusion, for the reasons discussed above, and in consideration of the customers' business continuity, the Postal Service hereby moves for temporary relief to allow the existing contract to remain on the competitive products list for thirty additional days.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing and Product Support

Elizabeth A. Reed

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3179, Fax -6187  
[elizabeth.a.reed@usps.gov](mailto:elizabeth.a.reed@usps.gov)  
December 11, 2015